

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., *et al.*,

Debtors.¹**

Chapter 11

Case No. 19-23649 (SHL)

(Jointly Administered)

[PROPOSED] ORDER HOLDING IN ABEYANCE LATE CLAIM MOTIONS

Upon the motions of Seung Han [Dkt. No. 4888] and Roy Howard Murry [Dkt. No. 4889] (the “**Late Claim Motions**”) seeking leave to have their personal injury proofs of claim (the “**Late Claims**”) deemed timely filed notwithstanding that the Late Claims were not filed before the extended general bar date for claims to be filed in these chapter 11 cases (the “**Extended General Bar Date**”); and the Court having jurisdiction to consider the matters raised in the Late Claim Motions pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and consideration of the Late Claim Motions and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and, after due and sufficient notice of the Late Claim Motions, there being no pending objections to

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

the requested relief; and the Ad Hoc Group of Individual Victims having consented to the relief sought in the Debtors' and the Official Committee of Unsecured Creditors' response to the Late Claim Motions; and, after due deliberation and for the reasons set forth on the record of the hearing on the Late Claim Motions held on August 17, 2022, IT IS HEREBY ORDERED THAT:

1. The Late Claim Motions are held in abeyance until the first omnibus hearing held at least 21 days after entry by the Court of a final order approving the Debtors' chapter 11 plan of reorganization, as may be modified.

2. Except as expressly set forth in this Order, nothing contained herein shall be an admission or waiver of the substantive or procedural rights, remedies, claims, or defenses of any of the parties in these chapter 11 cases, whether at law or equity.

3. The relief provided for herein applies only to the Late Claim Motions, and nothing in this Order shall in any way be construed as applying to any other late claim motions, as to which all rights are reserved, notwithstanding that the Debtors may seek the Court's approval of a process whereby future late claim motions filed by similarly-situated movants are held in abeyance and scheduled for resolution at the same time as the Late Claim Motions.

4. The Debtors are authorized to take all actions necessary or appropriate to effectuate the relief granted in this Order.

5. This Court retains exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2022
White Plains, New York

THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE